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10/11/02
[Signature]*

October 8, 2002

VIA OVERNIGHT DELIVERY

Gwendolyn Massenburg
Regional Project Manager
U.S. EPA Region V
77 West Jackson Blvd.
Chicago, IL 60604

Re: Chemical Recovery Systems, Inc. (CRS) Site Quality Assurance Project Plan Revision #1

Dear Ms. Massenburg:

On behalf of the CRS Site Group, Respondents to the Administrative Order on Consent (AOC) for the Chemical Recovery Systems, Inc. (CRS) Site in Elyria, Ohio, I submit the following revised deliverable for your review and approval:

1. The CRS Site Quality Assurance Project Plan, Revision #1.

Pursuant to AOC ¶ 64, this deliverable was originally submitted within ninety (90) days of the effective date of the AOC (August 27, 2002). On or about September 10, 2002, the CRS Site Group received a Notice of Deficiency dated September 4, 2002, containing the following itemized deficiency:

The QAPP submitted does not comply with the guidance documents identified in the AOC Section VIII, Work To Be Performed, Paragraph 64.A.2, "U.S. EPA Guidance for Quality Assurance Project Plans (QA/G-5)" (U.S. EPA/600/R-98/018, February 1998) and "U.S. EPA 240/B-01/003, March 2001." You must revise your QAPP to comply with these guidance documents before it can be approved by U.S. EPA.

The Revised QAPP is being submitted within thirty (30) days of receiving U.S. EPA comments in accordance with AOC ¶ 64.A.2. As required by AOC ¶ 89, I am submitting three (3) copies of these deliverables to the Regional Project Manager and, in accordance with the CRS Site Statement of Work, I am sending one copy to U.S. EPA Office of Regional Counsel (attention Tom Nash) and one copy to Ohio EPA's Northwest District Office (attention Larry Antonelli). With your approval, communicated

Gwendolyn Massenburg

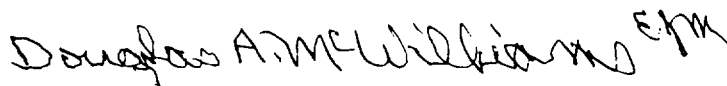
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to me by telephone today, I am submitting a bound version of the Revised QAPP without Appendix A, the Severn Trent Laboratories, Inc. QA/QC Plan and SOPs. Appendix A, which spans the majority of Volume I and all of Volume II of the original QAPP, has not been revised. Therefore, to conserve resources, I have enclosed a new, separately bound Volume I of QAPP Revision #1 and new cover sheets for the two binders originally submitted that now identify these binders as Volume II and Volume III of QAPP Revision #1. Please remove the QAPP sections of new Volume II in front of Appendix A because these sections have been replaced by the contents of new Volume I.

Please contact me if you have any clarifying questions regarding this deliverable or if you would like to discuss any aspect of this plan.

Sincerely,

A handwritten signature in black ink that reads "Douglas A. McWilliams" followed by a stylized monogram "EPM".

Douglas A. McWilliams

Enclosure

Copy: Thomas C. Nash, U.S. EPA
Lawrence Antonelli, Ohio EPA
CRS Site Group